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Attorneys for Defendant 1 HOTEL WEST
HOLLYWOOD, L.L.C.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

SUNNY KHACHATRYAN, AN
INDIVIDUAL; TATEVIK
KHACHATRYAN, AN INDIVIDUAL;
B.A.J., A MINOR; AND I.M., A
MINOR,

Plaintiffs,

v.

1 HOTEL WEST HOLLYWOOD,
L.L.C.,

Defendant.

Case No. 2:23-cv-10829

**NOTICE OF MOTION AND
MOTION TO COMPEL
PLAINTIFFS' DISCOVERY
RESPONSES AND THE
DEPOSITION OF PLAINTIFF
SUNNY KHACHATRYAN**

Discovery Cut-Off: 11/25/2024
Pre-Trial Conference: 4/7/2025
Trial: 4/29/2025
Hearing Date: 9/13/2024
Time: 9:30 a.m.

**TO THE HONORABLE COURT, ALL PARTIES, AND THEIR
ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that on September 13, 2024 at 9:30 a.m., or as soon thereafter as the matter may be heard in the above-mentioned Court located at 255 East Temple Street, Los Angeles, CA 90012, Defendant 1 Hotel West Hollywood, LLC ("1 Hotel") will and hereby does respectfully move for an order to compel Plaintiffs to provide: (1) proper Rule 26 damages calculation; (2) substantive responses to all interrogatories; (3) all documents responsive to 1 Hotel's requests

1 for production, and (4) Sunny Khachatryan to sit for a discovery deposition. This
2 motion is necessary because after discovery was served and extensive meet and
3 confer requests were ignored, Plaintiffs have failed to produce highly relevant
4 documents and information. 1 Hotel seeks an order compelling Plaintiff to meet her
5 discovery obligations.

6 1 Hotel made multiple attempts to meet and confer prior to the filing of this
7 motion pursuant to C.D. Cal. Local Rule 37-1 and Fed. R. Civ. P. 37 and as set forth
8 in the Declaration of Myriah V. Jaworski, filed contemporaneously herewith, but
9 Plaintiffs never met with 1 Hotel. Plaintiffs have not produced documents or
10 answered interrogatories relevant to their claims and 1 Hotel's defenses.

11 This Motion is based upon this Notice of Motion, the Memorandum in
12 Support of this Motion, the Declaration of Myriah V. Jaworski, all pleadings and
13 papers on file in this action, and upon such other evidence and argument as may be
14 presented to the Court at the time of the hearing.

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16 Dated: August 19, 2024

CLARK HILL PLC

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19 By: s/ Myriah V. Jaworski
Myriah V. Jaworski

20 Attorneys for Defendant 1 HOTEL WEST
21 HOLLYWOOD, L.L.C.
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